

Lead-Based Paint Hazard Control Plan

for

Lurie Terrace
Three Parkview Place, Ann Arbor, Michigan 48103

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Site specific information included in this Lead-Based Paint Hazard Control Plan is based upon the *Lead-Based Paint Inspection & Risk Assessment Report*, dated June 29, 2020, prepared by Environmental Health & Safety Consultants and provided by Ann Arbor Affordable Housing Corporation (the Client). The Lead-Based Paint Inspection & Risk Assessment Report was compliant with U.S. Department of Housing and Urban Development (HUD), U.S. Environmental Protection Agency (EPA), and state of Michigan requirements.

Components with Lead-Based Paint

Based on the findings included in the Lead-Based Paint Inspection & Risk Assessment Report, the following components have been identified as lead-bearing at Lurie Terrace.

<i>Building Components with Lead-Based Paint Identified Within the Similar Group of Buildings</i>			
Property Name: Lurie Terrace - Three Parkview Place, Ann Arbor, Michigan			
Area	Room Equivalent	Component	Substrate
Exterior	Exterior	Door Trim	Wood
Exterior	Exterior	Support Beam	Wood

Introduction

Lurie Terrace consists of one (1) building constructed in 1950. The Service Manager shall implement the Lead Hazard Control Plan ("LHCP"), with assistance from the Community Manager. The Service Manager shall report incidents requiring action under the LHCP to the Community Manager for recordkeeping purposes, and to the property's Director of Maintenance, for quality assurance and control. This LHCP considers Interim Control Methods only. A thorough description of Interim Control Methods is provided in the Appendix. Directors of Construction shall consider abatement options during property upgrades, renovation or redevelopment.

Ongoing Monitoring and Maintenance

Lead-based paint has been identified on this property. Lurie Terrace management should continue to monitor lead paint condition, and request that tenants advise property management of any deteriorated paint conditions. Changes in paint condition may be caused by normal wear and tear, routine operations and maintenance work, or rehabilitation and repair activities, or failure of a building system. Lurie Terrace management should promptly return any deteriorated lead paint to an intact condition using Lead Safe Work Practices. Lurie

Terrace management must immediately incorporate ongoing lead-based paint maintenance activities into regular building operations, unless all lead-based paint has been successfully abated (either it was removed, or it was enclosed or encapsulated without failure of those treatments). Hazard control options for the specific lead-bearing components identified at this property are provided in the Appendix.

All team members, whose duties may involve disturbance of lead-based paint during routine maintenance, shall complete Lead-Safe Work Practices training, that conforms to the HUD/EPA “Work Smart, Work Wet, Work Clean to Work Lead Safe” course, and training refreshers on a schedule established by the property owner. Renovation, repair or abatement work involving disturbance of lead-painted components shall be performed by a Michigan Department of Community Health (MDCH) Lead Abatement Contractor or a U.S. EPA Renovation, Repair and Painting (RRP) contractor with the proper training and/or licensing credentials in accordance with state and federal regulations. All ongoing monitoring and maintenance activities shall be overseen and documented by the Service Manager or Director of Maintenance. Training and licensing/certification requirements are described below.

Workers will use Lead Safe Work Practices, as described in their annual training, when any coating is disturbed during routine maintenance.

Annual Visual Survey and Re-evaluations

Environmental Health & Safety Consultants, LLC recommends the following schedule for visual assessment and re-evaluations:

1. Conduct a Visual Survey for hazards at unit turnover and every 12 months.
2. Conduct a re-evaluation every 2 years, unless all lead-based paint has been removed or two consecutive reevaluations find no lead-based paint hazards.

All team members, whose duties may involve a Visual Survey of lead-based painted components, shall complete the HUD Lead Based Paint Visual Assessment Training on the HUD website:

<https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>

Minimum Requirements to Control Lead-Based Paint Hazards

In the event deteriorated lead-based paint is observed during the visual survey described above, the following procedures and timelines must be observed in properties receiving federal assistance. In properties not receiving federal assistance, the following procedures and timelines are recommended.

In units with children under age 6 and associated common areas, the owner has 90 days to eliminate all lead-based paint hazards. In all other dwelling units, common areas, and the remaining portions of Lurie Terrace where there are no children younger than age 6, corrective

actions shall be completed no later than 12 months after identification of the hazards. These are minimum requirements in properties receiving federal assistance, and Lurie Terrace management should make every effort to eliminate all lead-based paint hazards within 90 days of knowledge of same. Hazards can be eliminated either through permanent abatement or Interim Controls. Hazard control methods are described below.

Record of Hazard Treatments

Lead-based paint hazards shall be stabilized promptly, and within the time restrictions described above, as required. Records of all hazard treatments shall be kept in the properties record keeping system. A sample Hazard Control Record table is provided on the following page. It is to be completed by the Service Manager in the event deteriorated lead-based paint is observed.

Sample Hazard Control Record				
Property Name: Lurie Terrace - Three Parkview Place, Ann Arbor, Michigan				
Type of Hazard	Room or Location	Surface	Method Used to Control Hazard	Date Hazard Controlled
Lead Paint	Exterior	Wood Door Trim	Paint Stabilization	
Lead Paint	Exterior	Wood Support Beam	Paint Stabilization	

Tenant Notification Requirements and Recordkeeping

Tenants affected by any disturbance of lead-based paint or suspect lead-based paint must be notified by the contractor in accordance with the U.S. EPA Lead Pre-Renovation Education Regulation or the U.S. EPA Renovation, Repair and Painting Regulation, depending on the regulation applicable to the work performed.

Hazard Control Methods – Interim Control of Paint Hazards

1. **Conduct paint stabilization.**
 - a. Paint stabilization includes appropriate surface preparation and the application of new paint or coating. If conditions exist that contributed to the lead-based paint deterioration, such as a leaking roof, correct those conditions. Treated surfaces shall be made smooth and cleanable.
 - b. Use lead-safe work practices and trained or licensed personnel.
 - c. Do not allow residents in the work area until it has been properly cleared.

- d. Obtain a clearance examination of the unit by a licensed lead-based paint inspector or risk assessor following cleanup.

2. Conduct ongoing maintenance.

- a. Stabilize all lead-based paint that deteriorates.
- b. Repair damaged encapsulants/enclosures.
- c. Use lead-safe work practices and trained or licensed personnel.
- d. Notify residents and establish reporting system for deteriorated lead-based paint.

Appendix

Lead-Based Paint Hazard Control Options

This section discusses options for controlling lead-based paint hazards, whether they were found during this lead evaluation, or may occur in the future. Whether the Property Owner must incorporate ongoing lead-based paint maintenance and reevaluation into regular building operations depends on whether lead-based paint was identified at the property.

As lead-based paint was found, HUD requires that the Property Owner control any lead-based paint hazards identified, and incorporate ongoing lead-based paint maintenance and reevaluation into regular building operations.

Lead-safe work practices and worker/resident protection practices complying with current EPA, HUD, OSHA and Michigan Department of Community Health (MDCH) standards will be necessary to complete all work safely involving the disturbance of lead-based paint coated surfaces and components. Lead-based paint hazard control activities include both interim control (temporary) methods and/or abatement (permanent) methods. It should be noted that all lead-based paint hazard control activities have the potential to create hazards that were not present before. As shown below, all persons and/or firms performing lead-based paint hazard control activities should have received proper training in lead-safe work practices and/or Lead Abatement, in accordance with Federal and State regulations. Details about lead-based paint hazard control options and issues surrounding resident/worker protection practices can be found in the *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* published by HUD, as well as in the Occupational Safety and Health Administration (OSHA) regulations found in 29 CFR section 1926.62, the OSHA Lead Exposure in Construction Industry Standard.

Prohibited Work Practices

The following work practices are prohibited on lead-bearing components, and are not recommended for use on any coated surface:

1. Open-flame burning or torching of painted surfaces.
2. The use of machines designed to remove paint or other surface coatings through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, is prohibited on painted surfaces unless such machines have shrouds or containment systems and are equipped with a HEPA vacuum attachment to collect dust and debris at the point of generation. Machines must be operated so that no visible dust or release of air occurs outside the shroud or containment system.
3. Operating a heat gun on painted surfaces is permitted only at temperatures below 1,100 degrees Fahrenheit.
4. Use of chemical strippers containing methylene chloride.

Interim controls

Interim controls, as defined by HUD, means a set of measures designed to reduce human exposure temporarily to lead-based paint hazards. These activities may include, but are not limited to: component and/or substrate repairs; paint and varnish repair; the removal of dust-lead-based paint hazards by extensive and specialized cleaning; ongoing lead-based paint maintenance; temporary containment; placement of seed, sod or other forms of vegetation over bare soil areas, etc. Interim controls for soil-lead hazards may include the placement of at least 6 inches of an appropriate mulch material over an impervious material, laid on top of bare soil area, and the tilling of bare soil areas. Interim controls must be periodically evaluated for their continued effectiveness as part of an ongoing lead-based paint maintenance program.

Workers conducting interim controls must be trained in a course delivered using a HUD-approved Lead-Safe Work Practices training curriculum, at a minimum. Training and certification requirements are described below. A list of HUD-approved courses and training providers is available through the HUD web site at:

www.hud.gov/offices/lead/training/hudapproval_main.cfm.

Area of Disturbance	Quantity of Disturbance	Minimum Training Required	Certification Required
Interior components with large surface areas (walls, ceilings, etc.)	> 2 SF (see RRP Quantities below)	HUD Lead-Safe Work Practices (LSWP)*	LCWP Training Certificate
Component types with small surface areas (soffits, baseboards, trim, etc.)	> 10% of Total Component Surface Area (see RRP Quantities below)	HUD LSWP*	LCWP Training Certificate
Interior Components	> 6 SF of Painted Surface Per Room	EPA Renovation Repair & Painting (RRP)	EPA-Certified RRP Firm & Certified Renovator
Exterior components	> 20 SF of Painted Surface	EPA RRP	EPA-Certified RRP Firm & Certified Renovator

* HUD-approved Lead-Safe Work Practices training is required in federally assisted housing, and is recommended in all Target Housing and Child-Occupied Facilities. Work requiring LSWP training, at a minimum, may be performed by an EPA-certified RRP Firm employing a Certified Renovator.

Clearance after interim controls must be conducted by a Michigan-licensed lead-based paint inspector or inspector/risk assessor. All interim control work shall be followed by clearance sampling.

Abatement

Abatement, as defined by HUD and the U.S. EPA, means any set of measures designed to eliminate lead-based paint and/or lead-based paint hazards permanently. The people providing these services must to be trained in accordance with State or EPA licensing/certification

requirements. The product manufacturer and/or contractor must warrant abatement methods to last a minimum of 20 years, or these methods must have a design life of at least 20 years.

Abatement activities may include, but are not necessarily limited to: the onsite or offsite removal of lead-based paint from substrates and components; the replacement of components or fixtures painted with lead-based paint; the permanent enclosure of lead-based paint with construction materials mechanically-fastened to the substrate; the encapsulation of lead-based paint with specially designed encapsulant products; or the removal or permanent covering (concrete or asphalt) of soil-lead-based paint hazards. If enclosure or encapsulation is conducted as an abatement method, the lead-based paint remains on the property, so ongoing lead-based paint maintenance is required.

The firm providing the abatement services must be licensed as an abatement contractor by MDCH. Workers conducting abatement must be trained and licensed as abatement supervisors or workers by a training provider accredited by MDCH. Work performed for the purpose of renovation or repair does not require the use of a licensed Abatement Contractor.

All abatement work shall be approved and coordinated through the property’s Director of Construction.

Control Option Tables

The following tables provide options for controlling lead-based paint hazards.

HAZARD TYPE #1:	Lead Dust and Debris Present on the Property Before Work Begins.
a)	<p>Special cleaning <i>preceding</i> lead-based paint hazard control activities. Before any lead-based paint hazard control activities, the site and structure should be pre-cleaned following the cleaning protocols in the HUD <i>Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing</i>, published by the U.S. Department of Housing and Urban Development (June 1995, Revised 2012.) Some of the required steps include removing large debris and paint chips followed by HEPA vacuuming of all horizontal surfaces (floors, windowsills, troughs, etc.) The cleaning protocols in the HUD <i>Guidelines</i> will assist the contractor in doing a preliminary cleaning and will improve the chances of passing the clearance examinations that are required after routine maintenance work, rehabilitation, and lead-based paint hazard control in pre-1978 properties.</p>

HAZARD TYPE #2:	Deteriorated Lead-Based Paint on Exterior Siding and Trim Components.
a)	INTERIM CONTROLS: The lead-based paint hazard created by the deteriorating lead-based paint coatings on the exterior siding and trim components may be addressed by repairing substrate damage and then properly preparing the surfaces to receive new paint and repainting with high-quality latex or oil-based paints (paint stabilization). This activity has the potential to create substantial lead dust, especially during preparation work, so extra care must be taken by the contractor to limit and contain the dust generated.
b)	ABATEMENT ACTIVITIES: There are three options for abatement of exterior siding: 1) Enclosure of all exterior siding components with vinyl or metal siding and the covering of all trim components with pre-finished aluminum wrap materials, 2) Removal and replacement of lead-based paint painted exterior siding and/or trim components, 3) Use of an approved encapsulant system covering all exterior siding and trim surfaces. If encapsulation is used, a test patch must be made up prior to installation. These methods usually generate small to medium amounts of lead-contaminated dust and will permanently cover or replace the deteriorated surfaces, eliminating most future hazards. Even though the potential for lead dust contamination is generally less with these methods of lead-based paint hazard control, special attention to work practices will be needed to limit dust generation.

HAZARD TYPE #3:	Deteriorated Lead-Based Paint on the Exterior Door and Door Trim Components
a)	INTERIM CONTROLS: The interim control option for the deteriorating lead-based paint coatings on the exterior door and door trim is paint stabilization of the door and trim. Friction or impact surfaces must be eliminated by wet -planing and adjustment of the door in the frame. This may also include the replacement of the stop trim pieces or the installation of a rubber or foam barrier between the stop and the door. These activities have the potential to create a high volume of lead-contaminated dust, so extra care must be taken by the contractor to limit and contain the dust generated.
b)	ABATEMENT ACTIVITIES: There are two abatement options: 1) Offsite stripping of the door and rehangng or replacing the doorframe and door leaf. Offsite stripping has the potential to create a low volume of lead-contaminated dust. 2) Replacing the door by removing the entire door and all framing, and the installation of a new prehung door dwelling unit. This activity has the potential to create a high volume of lead-contaminated dust. If removal of the door and installation of a new door is selected, containment must be in place to protect residents and workers for the entire duration of the work and extra care must be taken by the contractor to limit and contain the dust generated.

HAZARD TYPE #4:	Lead-Based Paint Dust Hazard on Floor Surfaces
CARPETED FLOORS	
a)	INTERIM CONTROLS: The lead-based paint hazard created by lead dust on interior carpeted floors is addressed by special steam cleaning of the affected areas. Minimum

	specifications include beater HEPA vacuuming, professional steam cleaning, and final HEPA vacuuming. Note: Depending on the amount of carpet contamination that is present, it should be noted that dust levels after cleaning may not be low enough to meet HUD clearance standards.
b)	ABATEMENT ACTIVITIES: Removal and replacement of the carpet is the only option to meet HUD clearance standards for dust levels following lead-based paint hazard control work. The carpet must be wetted and cut into manageable sections before being rolled and wrapped in plastic sheeting for removal. Sub-floor must be HEPA-vacuumed and wet-mopped before installation of new material. These activities have the potential to create a high volume of lead dust. Carpet removal has the potential to create large amounts of dust, so containment must be in place during the duration of the work to protect residents and workers. Extra care must be taken by the contractor to limit and contain the amount of dust generated.
BARE FLOORS	
c)	The dust-lead hazard on interior bare floors is addressed by special wet cleaning of the affected areas. Minimum specifications include HEPA vacuuming; wet wiping; and final HEPA vacuuming.

HAZARD TYPE #5:	Potential of Residual Lead Dust or Debris Following Lead Hazard Control Activities.
a)	Special cleaning <i>following</i> lead-based paint hazard control activities. Immediately after any lead-based paint hazard control activities, the work area (or unit, as applicable) must be thoroughly cleaned following the cleaning protocols in the <i>Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing</i> , published by the U.S. Department of Housing and Urban Development (June 1995, Revised 2012). As a minimum, proper teardown and disposal of all containment plastic, HEPA vacuuming of all horizontal surfaces (floors, windowsills, troughs, etc.), detergent scrubbing of all surfaces, and final HEPA-vacuuming are required. The cleaning protocols in the HUD <i>Guidelines</i> and the lead-safe work practices training courses assist the contractor with cleanup and will improve the chances of passing the clearance examinations (required after routine maintenance work, rehabilitation, and lead-based paint hazard control in pre-1978 properties.)

ADDITIONAL NOTES:

- 1) When maintenance or other work impacts a building material, surface coating, substrate, component, or surface and its lead content is not known, those areas and/or items must be presumed to be lead-based paint.

- 2) During the period of lead-hazard control activities, daily cleaning of the work areas should be performed. Accumulation of debris should be prevented. All waste material must be disposed of promptly and properly. At the end of each day, time must be reserved for a thorough cleaning of the work area.